

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

AFTER II MOVIE, LLC, ET AL.,

Plaintiffs,

v.

GRANDE COMMUNICATIONS
NETWORKS, LLC,

Defendant.

No. 1:21-cv-00709-RP

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO IDENTIFY AND SEND NOTICE LETTERS TO SUBSCRIBERS**

Defendant Grande Communications Networks, LLC (“Grande”), respectfully requests a 21-day extension of time from the Court, up to and including January 17, 2022, to identify subscribers and provide the subscribers notice pursuant to the Cable Act and the Court’s October 6, 2022 Order. Dkt. No. 53, ¶ 4. In support of this unopposed Motion, Defendant states as follows:

1. On October 6, 2022, the Court entered an Order addressing the process for how Plaintiffs can request the identification of a select number of subscribers, and how Grande is to notify those subscribers in compliance with the Cable Act. Dkt. No. 53. The Court ordered Grande to notify its subscribers (Dkt. No. 53, ¶ 4) and, after a subscriber receives notice, the subscriber has 21 days to object to the disclosure of his or her identity (Dkt. No. 53, ¶ 5).
2. Plaintiffs served discovery requests seeking the identification of a number of Grande’s subscribers. Grande has been working diligently to identify and notify the relevant subscribers based on the IP Addresses and event dates identified by Plaintiffs. Grande has identified and attempted to send notice to the majority of the subscribers identified by Plaintiffs.

Grande, however, has thus far been unable to identify the subscribers with the following IP

Addresses: **130.45.73.91; 65.36.17.90; 65.36.127.227; 24.155.16.122; 72.48.9.6;**
24.155.60.94; 65.36.92.191; 24.155.221.54; 72.48.180.132; 24.155.37.214; 72.48.131.112;
24.155.209.206; 66.90.146.212; 65.36.121.107; 24.155.116.81; 66.196.3.46; 24.155.194.2;
24.155.109.231; 130.45.12.85; 130.45.10.187; 130.45.19.45; 130.45.19.89; 130.45.4.88;
130.45.45.123; 130.45.61.90; 67.198.119.7; 24.155.39.46; 67.198.98.42; 66.90.206.129;
66.196.3.46; 72.48.75.119; 72.48.50.202; 24.155.46.18; 65.36.103.4; 24.155.47.29;
24.155.35.35; 66.196.2.88; 66.196.0.118; 130.45.39.59; 66.90.188.112; 24.155.114.201;
130.45.46.45; 130.45.76.241.

3. Grande's investigation continues regarding the above identified IP Addresses.

4. Grande requests an additional 21-days of time from the filing of this Motion to comply with the Cable Act and the Court's October 6, 2022 Order to identify and notify the subscribers identified by Plaintiffs.

5. Plaintiffs' council does not oppose this motion and this motion is not made for any purpose of delay.

Dated: December 27, 2022

Respectfully submitted,

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